

STATEMENT OF BASIS (AI No. 165278)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0124907 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Louisiana Department of Transportation and Development
I-310 Mississippi River Bridge at Luling
5080 Florida Boulevard
Baton Rouge, LA 70806

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Ronda Burtch

DATE PREPARED: November 13, 2009

1. PERMIT STATUS**A. Reason For Permit Action:**

Issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit – NPDES permit effective date: N/A
NPDES permit expiration date: N/A

C. LPDES permits – LPDES permit effective date: N/A
LPDES permit expiration date: N/A

D. Date Application Received: October 29, 2009

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY – bridge hydrocleaning**

A contractor hired by the Louisiana Department of Transportation and Development (LADOTD) is tasked with hydro-cleaning various structural components of the I-310 Mississippi River Bridge at Luling. Areas of the bridge to be cleaned include the bridge towers, faring panel, and superstructure. Internal cleaning will cover components of the bridge such as anchorage boxes, towers, and faring plates.

Due to the construction material and design of the bridge, over the years, some oxidation of the steel has occurred and debris and other bird wastes have accumulated on/within the bridge components. All debris on/within the bridge will be removed by hand before the hydro-cleaning. All trash and other items removed from the structures will be bagged and removed from the site at the end of each shift. Loose rust, garbage, nesting material, and pigeon waste will be disposed of as ordinary household waste.

Potable water will be the primary cleaning agent, which will result in the production of washwater that will be discharged into the Mississippi River. The contractor will use power washers with a minimum of 3,500 psi to clean the various sections of the bridge. Washwater generated during the cleaning process of the bridge towers will be collected below the area being power washed. Residues/debris will be filtered from the washwater, for proper disposal,

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prior to water being discharged into the river. All washwater will be addressed by Best Management Practices (BMPs) in Part II of the permit. Some washwater from the faring panel area will drain directly into the river due to construction design and pitting of the steel.

The bridge is constructed of "weathering steel" and has no painted surfaces. Therefore, no paint residue will be in the washwater. However due to natural oxidation of the steel, residual rust is expected to be in the washwater during the cleaning process. After the power wash phase, workers will vacuum all remaining water and wipe all surfaces to remove excess water.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: II
4. SIC code: 1622

C. LOCATION - I-310 Bridge over the Mississippi River at Luling, St. Charles Parish
Latitude 29° 56' 32", Longitude 90° 22' 25"

3. **OUTFALL INFORMATION**

Outfall 001

Discharge Type: hydro-cleaning wastewater

Treatment: filtration

Location: first tower on the westbound side of the bridge leaving Luling, Latitude 29° 56' 23 N, Longitude 90° 22' 33" W

Flow: variable

Discharge Route: Mississippi River

Outfall 002

Discharge Type: hydro-cleaning wastewater

Treatment: filtration

Location: first tower on the eastbound side of the bridge leaving Luling, Latitude 29° 56' 22 N, Longitude 90° 22' 33" W

Flow: variable

Discharge Route: Mississippi River

Outfall 003

Discharge Type: hydro-cleaning wastewater

Treatment: filtration

Location: second tower on the westbound side of the bridge leaving Luling, Latitude 29° 56' 33" N, Longitude 90° 22' 26" W

Flow: variable

Discharge Route: Mississippi River

Outfall 004

Discharge Type: hydro-cleaning wastewater

Treatment: filtration

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Location: second tower on the eastbound side of the bridge leaving Luling, Latitude 29° 56' 32" N,
Longitude 90° 22' 25" W
Flow: variable
Discharge Route: Mississippi River

4. RECEIVING WATERS

STREAM - Mississippi River

BASIN AND SEGMENT - Mississippi River Basin, Segment 070301

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
d. drinking water supply

5. TMDL STATUS

Subsegment 070301, Mississippi River - From Monte Sano Bayou to Head of Passes, is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. CHANGES FROM PREVIOUS PERMIT

This is an initial permit.

7. COMPLIANCE HISTORY/COMMENTS

A. OEC – On June 19, 2009, Administrative Order WE-AO-09-0171 was issued to the Louisiana Department of Transportation and Development. The Administrative Order was issued granting the Respondent authority to perform hydrocleaning activities.

B. DMR Review/Excursions – This is an initial permit; therefore, there are no DMRs on file.

8. EXISTING EFFLUENT LIMITS

This is an initial permit.

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon, which is listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

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10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for Louisiana Department of Transportation and Development

1. **Outfalls 001, 002, 003, and 004 - hydro-cleaning wastewater (estimated flow is variable)**

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	Mg/L		
Based on BPJ and on permits for similar facilities, no effluent limitations are established for hydrocleaning wastewater from bridge structures. Best Management Practices (BMPs) for hydrocleaning activities are listed in Part II of the permit.			

Treatment: filtration

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC 33:IX.2511.B.14.a-k, storm water discharges from facilities classified as SIC code 1622 are not considered to be associated with industrial activities. Therefore, an SWP3 is not included in the permit.